



DAFNEY DUBUISSON STOKES  
Member of NJ, PA, NY, OH and AK Bars

[dstokes@wongfleming.com](mailto:dstokes@wongfleming.com)

January 28, 2025

**VIA ECF**

Hon. Jesse M. Furman  
U.S. District Judge  
U.S. District Court – S.D.N.Y.  
40 Foley Square  
Brooklyn, NY 11201

**Re: Iuliia Potapova v. Toyota Motor Credit Corporation**  
Docket No. 1:23-cv-00571-JMF

Dear Judge Furman,

We represent Toyota Motor Credit Corporation (“Defendant”) in the above-referenced action. We write jointly with Plaintiff Iuliia Potapova (“Plaintiff”) (together, the “Parties”) pursuant to Section 6.F of Your Honor’s Individual Rules and Practices in Civil Cases, requesting that the Court enlarge the deadline by which the Parties are to respond to the opponent’s motions in limine. (ECFs 66, 67.) Those Motions were filed January 16, 2025, and by the Court’s Practices, responses were originally due January 23, 2025. FURMAN INDIV. PRACTICES § 6.F.i. A previous six-day enlargement was granted by Your Honor on January 26, 2025, making the response briefs due January 29, 2025. (ECF 76). The Parties would respectfully request that the Court grant an additional six-day enlargement, making the response briefs due February 4, 2025. Because good cause exists to enlarge the deadline, the Court should grant the Motion.

Yesterday, Defendant’s counsel experienced a catastrophic computer glitch or error which led to the deletion of responsive materials. Defendant’s counsel has been working diligently to recreate the lost documents and requests additional time to in order to repair its lost documentation completing its responses to Plaintiff’s motions in limine. Plaintiff’s counsel has consented to this request, and we therefore jointly request that the Court grant the Motion and enlarge the deadline.

This is the Parties’ second request to enlarge the deadline by which they are to respond to motions in limine. This request is not made for reasons of delay or other purpose, and this request will not impact any other deadlines in the case as the trial date has been set for May 6, 2025. The Parties do not anticipate further requests for an extension.

Based on the foregoing, the Parties therefore request that the Court grant this Motion and enlarge the Parties’ deadline to file their responses to motions in limine to Wednesday, February 4, 2025.

821 ALEXANDER ROAD, SUITE 200 • P.O. BOX 3663 • PRINCETON, NJ 08543-3663  
TEL: (609) 951-9520 • FAX: (609) 951-0270

[WWW.WONGFLEMING.COM](http://WWW.WONGFLEMING.COM)

CALIFORNIA • DISTRICT OF COLUMBIA • FLORIDA • GEORGIA • IDAHO • INDIANA • MARYLAND  
MICHIGAN • NEVADA • NEW JERSEY • NEW YORK • OREGON • PENNSYLVANIA • TEXAS • WASHINGTON

ATTORNEYS ADMITTED SOLELY IN THE JURISDICTION WHERE LISTED OFFICE IS LOCATED, UNLESS OTHERWISE NOTED



Thank you for your consideration. If you have any questions, please do not hesitate to contact our office.

Respectfully submitted,

**WONG FLEMING**  
/s/ Dafney Dubuisson Stokes  
Dafney Dubuisson Stokes  
Counsel for Defendant

/s/ Craig C. Marchiando  
Craig C. Marchiando  
Counsel for Plaintiff

Application GRANTED. The Clerk of Court is directed to terminate ECF No. 80.

SO ORDERED.

A handwritten signature in black ink, appearing to read 'Jen B.'

January 29, 2025